



CC BY-NC-SA



Purple Communications, Inc.
595 Menlo Drive
Rocklin, CA 95765
Tel 800 900 9478



REDACTED – FOR PUBLIC INSPECTION

business information that is not customarily disclosed to the public and is subject to Exemption 4 under the Freedom of Information Act.

As this information is submitted voluntarily and absent any requirement by statute, regulation, or the Commission, Purple, Convo and ZVRS request that, in the event that the Commission denies the request for confidentiality, the Commission return the materials without consideration of the contents therein.²

Respectfully submitted,

/s/ Michael Strecker

Michael Strecker
Vice President of Regulatory and Strategic Policy
Purple Communications, Inc.

/s/ Jeff Rosen

Jeff Rosen
General Counsel
Convo Communications, LLC.

/s/ Gregory Hlibok

Gregory Hlibok
General Counsel
CSDVRS, LLC.

² See 47 C.F.R. § 0.459(e).



Purple Communications, Inc.
595 Menlo Drive
Rocklin, CA 95765
Tel 800 900 9478



convo

REDACTED – FOR PUBLIC INSPECTION

Cc: Jennifer Thompson
Karen Peltz Strauss
Eliot Greenwald
Bob Aldrich
Andy Mulitz
Daryl Cooper



Purple Communications, Inc.
595 Merlo Drive
Rocklin, CA 95765
Tel 800 900 9478



REDACTED – FOR PUBLIC INSPECTION

October 24, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

RE: Notice of Ex Parte – Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123

Dear Ms. Dortch:

On October 20, 2016, Michael Strecker, Vice President of Regulatory and Strategic Policy, Purple Communications Inc. (“Purple”), Jeff Rosen, General Counsel, Convo Communications, LLC. (“Convo”); Sherri Turpin, Chief Executive Officer, CSDVRS, LLC (“ZVRS”); and Greg Hlibok, General Counsel, ZVRS (collectively “the Providers”) met with the following staff of the Federal Communications Commission (FCC or Commission): Karen Peltz Strauss, Deputy Bureau Chief, Consumer and Government Affairs Bureau (“CGB”); Eliot Greenwald, Deputy Chief, Disability Rights Office (“DRO”), CGB; Bob Aldrich, Attorney Advisor, CGB; Andy Multz, Compliance and Oversight Group Chief, Office of the Managing Director (“OMD”); Daryl Cooper, Attorney Advisor, DRO, CGB; and Jennifer Thompson, Special Advisor and Confidential Assistant, Office of Commissioner Rosenworcel.



Purple Communications, Inc.
595 Menlo Drive
Rocklin, CA 95765
Tel 800 900 9478



REDACTED – FOR PUBLIC INSPECTION

In the meetings, the Providers discussed the current competitive conditions in the VRS market, including the continued and potential impact of implementing dramatic VRS rate cuts on competitive providers' viability and ability to compete effectively for market share. Additionally, Convo and Purple presented a potential alternative VRS rate structure that the Commission could consider that would better stabilize the market and address many of those competitive conditions.

The Providers also discussed their views on various VRS-related service issues, including skills based routing, deaf interpreters, address book portability, speed of answer, and assigning iTRS phones numbers to hearing individuals who can use sign language to communicate. The providers encouraged the Commission to create a framework to support providers' innovation and implementation of such initiatives, which have the potential to enhance the utility of VRS to deaf and hard of hearing users.

The Providers also discussed their concerns regarding the TRS-URD, specifically in regards to the TRS-URD Administrator not implementing a single, universal, unique ID for customers upon registration; as well as concerns regarding entity and kiosk device registration within the TRS-URD and the provision of user self-certifications. Purple, Convo and ZVRS urged the Commission's review of whether the TRS-URD would go live in early December, as stated by the TRS-URD Administrator, given the fact that key details and elements of the URD required for a successful launch remain missing or premature.



Purple Communications, Inc.
595 Menlo Drive
Rocklin, CA 95765
Tel 800 900 9478



CONVO

REDACTED – FOR PUBLIC INSPECTION

Respectfully submitted,

/s/ Michael Strecker

Michael Strecker

Vice President Regulatory and Strategic Policy

Cc: Jennifer Thompson
Karen Peltz Strauss
Eliot Greenwald
Bob Aldrich
Andy Mulitz
Daryl Cooper

VRS Rate Proposal

VRS Market Distribution and Estimated Operating Margins

BEGIN CONFIDENTIAL

END CONFIDENTIAL

2017 Rate Plan is Not Sustainable

BEGIN CONFIDENTIAL

END CONFIDENTIAL

- Without competition and an opportunity for providers to earn a reasonable operating margin, the products and services offered to the VRS customers will stagnate with little motivation for the lone remaining provider to innovate and provide high quality service.
- As witnessed in other TRS services, a single provider market could actually result in higher costs to the Fund.

Proposed Rate Structure

BEGIN CONFIDENTIAL

END CONFIDENTIAL

CONFIDENTIAL

BEGIN CONFIDENTIAL

END CONFIDENTIAL

CONFIDENTIAL

Benefits of the Proposed 3 Tier Rate Structure

- Improves competition, preserves multiple provider marketplace
- Enables efficient, competitive providers to remain financially viable
- Encourages continued innovation and quality VRS services to the Deaf Community
- Maintains 3-tier structure, while adjusting to market realities: share distribution, scale economies and provider costs
- Better aligns rates with actual provider cost

BEGIN CONFIDENTIAL

END CONFIDENTIAL